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*Attorneys for Defendants Nationstar Mortgage LLC  
d/b/a Champion Mortgage Company (also  
erroneously sued as Nationstar Sub1 LLC and  
Nationstar Mortgage Holdings Inc.), MetLife Home  
Loans LLC (also erroneously sued as MetLife, Inc.,  
Synchrony Bank, and Synchrony Financial), and  
MetLife Bank, N.A.*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

SUSAN K. SWANGO,

Plaintiff,

v.

NATIONSTAR SUB1 LLC; NATIONSTAR  
MORTGAGE HOLDINGS INC.;  
NATIONSTAR MORTGAGE LLC D/B/A  
CHAMPION MORTGAGE COMPANY;  
METLIFE HOME LOANS LLC, METLIFE  
BANK, NATIONAL ASSOCIATION;  
METLIFE INC.; SYNCHRONY BANK;  
SYNCHRONY FINANCIAL; FIDELITY  
NATIONAL TITLE INSURANCE  
COMPANY D/B/A LAWYERS TITLE  
INSURANCE CORPORATION; ZIEVE,  
BRODNAX AND STEELE, LLP; BENJAMIN  
D. PETIPRIN,

Defendants.

Case No. 3:17-cv-01338-MO

**DECLARATION OF JAMES P.  
LAURICK IN SUPPORT OF  
NATIONSTAR MORTGAGE LLC D/B/A  
CHAMPION MORTGAGE COMPANY,  
METLIFE HOME LOANS LLC, AND  
METLIFE BANK, N.A.'S MOTION TO  
DISMISS PLAINTIFF'S SECOND  
AMENDED COMPLAINT**

I, JAMES P. LAURICK, declare as follows:

1. I am one of the attorneys for Defendants Nationstar Mortgage LLC d/b/a Champion Mortgage Company (also erroneously sued as Nationstar Sub1 LLC and Nationstar Mortgage Holdings Inc.), MetLife Home Loans LLC (also erroneously sued as MetLife, Inc., Synchrony Bank, and Synchrony Financial), and MetLife Bank, N.A. (collectively, “Defendants”). I make this Declaration on personal knowledge and in support of Defendants’ Motion to Dismiss the Second Amended Complaint of Plaintiff Susan Swango (“Plaintiff”).

2. Attached hereto as Exhibit 1 is a true and correct copy of the June 17, 2009 Fixed Rate Line of Credit Deed of Trust (Home Equity Conversion) (“Deed of Trust”) executed by Plaintiff relative to real property located at 8350 NE Hendricks Road, Carlton, OR 97111. The Deed of Trust was recorded in the Yamhill County property records on June 22, 2009, as document number 2009-09517.

3. Attached hereto as Exhibit 2 is a true and correct copy of the July 11, 2012 Assignment of Trust Deed by Beneficiary or His Successor in Interest (“Assignment”) prepared relative to the June 17, 2009 Deed of Trust (Exhibit 1). The Assignment was recorded in the Yamhill County property records on October 1, 2012, as document number 2012-14055.

4. Attached hereto as Exhibit 3 is a true and correct copy of the June 17, 2009 Fixed Rate Note – Closed End (Home Equity Conversion (“Note”) executed by Plaintiff relative to real property located at 8350 NE Hendricks Road, Carlton, OR 97111. The Note is secured by the Deed of Trust recorded in the Yamhill County property records on June 22, 2009, as document number 2009-09517 (Exhibit 1).

5. I attempted to confer with Plaintiff on April 19, 2018, by email and explained that Defendants are filing a motion to dismiss the Second Amended Complaint, and why, and provided the draft Motion to Plaintiff. I requested that Plaintiff contact me as soon as possible if she wished to discuss the Motion. As of the filing of the instant declaration, no agreement has been reached.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was executed on the 20<sup>th</sup> day of April, 2018, in Portland, Oregon.*

*/s/ James P. Laurick*

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James P. Laurick, OSB # 82150

**CERTIFICATE OF SERVICE**

I certify that on this 20<sup>th</sup> day of April, 2018, the foregoing **DECLARATION OF JAMES P. LAURICK IN SUPPORT OF NATIONSTAR MORTGAGE LLC D/B/A CHAMPION MORTGAGE COMPANY, METLIFE HOME LOANS LLC, AND METLIFE BANK, N.A.'S MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT** will be served in accordance with the Court's CM/ECF system which will send notification of such filing by notice via email to the ECF participants of record a true copy of the foregoing document with a copy sent to the following by U.S. mail in Portland, Oregon, enclosed in a sealed envelope with first class postage prepaid, addressed as follows:

Susan K. Swango  
8350 NE Hendricks Road  
Carlton, OR 97111  
Plaintiff *Pro Se*

KILMER VOORHEES & LAURICK, P.C.

*/s/ James P. Laurick*

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Champion Mortgage Company (also erroneously sued as  
Nationstar Subl LLC and Nationstar Mortgage Holdings  
Inc.), MetLife Home Loans LLC (also erroneously sued as  
MetLife, Inc., Synchrony Bank, and Synchrony Financial),  
and MetLife Bank, N.A.*